

1600 Hazen Street  
East Elmhurst, New York  
11370

★ NOV 25 2009 ★

BROOKLYN OFFICE

Mr. Andrew Myerberg,

Re: James Robinson v. Police Officer Mahmoud et.al.,  
09-Civ.-1450 (L.B.)

Pursuant to rule # 26 of the Federal Rules Of Civil Procedure (F.R.C.P.) I am requesting the following from the defense to be provided at a time not to exceed January 3,2010.

- 1) A complete list of all John/Jane Doe officers involved in the February 20 arrest of this plaintiff with accompanying photographs, name, rank, time on job, time on unit; and
- 2) A breakdown of the Name of the Narcotics unit named in the above captioned action and;
- 3) A complete list of complaints made against the Narcotics Unit involved in the February 20 arrest, including all active and resolved complaints and;
- 4) A complete list of any and all existing complaints made against any of the defendants throughout their career as employees of the New York City Police department related to but not limited to Corruption, Excessive use of Force, Abuse of Power, Theft, Planting Evidence, Falsefying Evidence, Any form of Conspiracy to Commit Crimes against Citizens, Violation of the Civil Rights and /or Constitutional Rights of Citizens, any and all reports of Officcial Misconduct by any of the defendants named herein in the above captioned Matter, and;
- 5) The precinct Logbooks and Duty Roster for the 67th Precinct for the dates of February 20,2009 and March 14,2009, and;
- 6) A copy of any formal Departmental Disciplinary actions taken against any and all employees named as defendants in this above captioned complaint, and/or any pending Departmental Disciplinary proceedings against any Departmental employees named as defendants in the above captioned action, and;
- 7) Notice of all active investigations of wrongdoing/misconduct by any and all departmental employees named as defendants in the above captioned matter, and;

*Plaintiff is reminded again that discovery is conducted between the parties. Discovery requests/responses shall not be filed with the Court. Plaintiff should not send the Court copies of his exchanges with defense counsel.*

Ordered: /s/  
12/7/09 Lois Bloom  
U.S. District Court

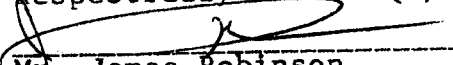
- 8) A copy of radio runs/Sprint Sheets as well as Transcripts of any and all communications made on Departmental equipment during the arrests that are the subject matter of the above captioned action in relation to the two arrests that are the subject matter of the above captioned action by any and all Departmental employees named as Defendants therein, and;
- 9) A copy of the transcripts of the personally owned telecommunication devices of the Two officers (Mahmoud and Daughtry) starting from 2 hours prior to the false arrest of this plaintiff and ending at the time not to exceed 2 hours past the time of the False arrest of this plaintiff in relation to the above captioned matter, and;
- 10) A copy of all written reports and/or police reports made by any and all Departmental employees named as defendants in the above captioned matter in relation to the arrests that are the subject matter of the above captioned matter, and;
- 11) A copy of the activity logbook for the days of the arrests that are the subject matter of the above captioned matter, and;
- 12) A copy of the scratch-pads of the Departmental employees that are named as defendants in the above captioned matter for the dates of false arrests of this plaintiff that are the subject of the above captioned matter, and;
- 13) A copy of the scratch-pads of the Uniformed patrol officers that had responded to the reports of Officers Daughtry and Mahmoud about a Gun at the location of 280 East 91st Street in Brooklyn, New York on the date of March 14, 2009 false arrest of this plaintiff, and;
- 14) A copy of any and Alcohol/Substance Abuse Treatment undertaken by any of the Departmental employees named as defendants in the above captioned matter, and;
- 15) A copy of any psychiatric evaluations and treatments for disorders that would directly affect their job performance and judgement, and;
- 16) A list of any and all psychotropic medications that may have been prescribed as a result of the aforementioned evaluations and treatments, and;
- 17) Any and all undisclosed discoverable information and materials that can be deemed relevant to the above captioned matter.

On the date of November 4, 2009 it was so ordered by Honorable judge LOIS BLOOM (E.D.N.Y.) that the Defendants would respond to the complaint by the 19th of November 2009 and that this plaintiff's prior request for Discovery must be turned over to the plaintiff 30 days thereafter.

HOWEVER, this plaintiff is willing to an extention not to exceed the date of January 3, 2009 since there has been some additions to the list of items requested as a matter of discovery.

At the scheduled teleconference for November 25, 2009 this plaintiff will seek acknowledgement of the receipt of this request for discovery from the defendants. Thank you very much.

Respectfully Submitted,

  
Mr. James Robinson  
Plaintiff Pro-Se  
N.Y.S.I.D.# 5224218-K

1600 Hazen Street  
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11370

Cc:

Honorable Lois Bloom  
Magistrate Judge (E.D.N.Y.)

Honorable Pro-Se Clerk (E.D.N.Y.)

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This is to affirm that Mr. James Robinson did formulate a motion as a REQUEST FOR DISCOVERY PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE RULE 26 and did place such request in the facility mailbox located at THE OTIS BANTUM CORRECTIONAL CENTER/NORTH FACILITY  
1600 Hazen Street  
East Elmhurst, New York 11370

For delivery to the defendant's counsel of Record: New York Law Dep't.  
Mr. Andrew Myerberg, Assistant Corporation Counsel  
100 Church Street  
New York, New York 10007

SWORN TO BEFORE ME ON THIS 21  
DAY OF November, 2009.

Fred Milano  
NOTARY PUBLIC

FRED MILANO  
NOTARY PUBLIC, State of New York  
Reg. No.: 01M16008046  
Qualified in Nassau County  
Commission Expires June 1, 2010

Mr. James Robinson  
Plaintiff Pro-Se  
N.Y.S.I.D.# 5224218-K

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11370

Mr. James Robinson 141-09-16520  
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East Elmhurst, New York 11370

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK (E.D.N.Y.)  
225 Cadman Plaza East  
Brooklyn, New York 11201  
Attention: HONORABLE Pro-Se Clerk



11201-1652

